Supplemental Supporting Statement – Part A

 **FIELD CROPS PRODUCTION**

 **Substantive Change**

OMB No. 0535-0002

This substantive change is being submitted as a supplemental supporting statement for program changes beginning with the 2024 production year. The program changes to be implemented include changes due to

1) Every five years NASS conducts a program review following the completion of the Census of Agriculture. NASS considered public input requested through a program review announcement [released on Dec. 19, 2023](https://www.nass.usda.gov/Newsroom/Notices/2023/12-19-2023.php) for these changes, and

2) Considering appropriated budget levels.

This substantive change is to accommodate the program changes that affect this ICR.

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

NASS maintains an annual estimating program for a vast array of commodities, covering the crop, economic, and livestock sectors of agriculture.

Every five years NASS conducts a program review following the completion of the Census of Agriculture. The primary purpose is to ensure that the NASS annual estimating program targets commodities and states most relevant based on the latest available information. The program review is announced and stakeholder input is requested.

The primary source of information for the program review is the Census of Agriculture, since it is the most comprehensive source of data; however, we also take into consideration estimates from the current annual estimating program and administrative data.

The program changes balance resources across all of the programs included in the annual estimating program while ensuring NASS’ annual statistical program aligns with its appropriation.

The program changes are summarized in the following Agricultural Statistics Board Notices:

April 4, 2024 “NASS announces program changes following five-year review” at this link: <https://www.nass.usda.gov/Newsroom/Notices/2024/04-04-2024.php>

April 9, 2024 “NASS discontinues select 2024 data collection programs and reports” at this link: <https://www.nass.usda.gov/Newsroom/Notices/2024/04-09-2024.php>

In addition to the changes listed above, NASS will no longer be publishing sugarcane acreage, production, and price statistics for Texas. This is due to the permanent closure of Texas’ only sugarmill as reported by the Texas Farm Bureau (<https://texasfarmbureau.org/texas-only-sugar-mill-to-close-permanently/>).

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

There are no changes from the original approval for the purposes of program changes.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

There are no changes from the original approval for the purposes of program changes.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There are no changes from the original approval for the purposes of program changes.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

There are no changes from the original approval for the purposes of program changes.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

There are no changes from the original approval for the purposes of program changes.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5 CFR 1320.5.**

There are no changes from the original approval for the purposes of program changes.

**8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

The Federal Register Notice soliciting comments was published on September 22, 2022 on pages 57864 - 57865. One public comment was received from Dr. Dennis Fixler in support of the continuation of this group of surveys. It is attached to this renewal package.

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

There are no changes from the original approval for the purposes of program changes.

**9. Explain any decision to provide any payment or gift to respondents.**

There are no changes from the original approval for the purposes of program changes.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

There are no changes from the original approval for the purposes of program changes.

**11. Provide additional justification for any questions of a sensitive nature.**

There are no changes from the original approval for the purposes of program changes.

**12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

The following table contains the updated estimated annual burden hours for this group of surveys with the discontinuation of the field crop county estimates surveys. Some burden was left for the County Agricultural Production Surveys incase State Cooperators want to fund samples to produce county-level estimates for select commodities in select States under full cost recovery basis.

Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Average annual reporting time of 111,621 hours is multiplied by $42.75 per hour for a total annual cost to the public of $4,771,797.75.

NASS uses the Bureau of Labor Statistics’ [Occupational Employment Statistics](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.bls.gov%2Foes%2Ftables.htm&data=05%7C02%7Crichard.hopper%40usda.gov%7C8d136a5b93964633cb0808dc58bc2c76%7Ced5b36e701ee4ebc867ee03cfa0d4697%7C1%7C0%7C638482812416203736%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=imTw5w4NH4agUWW%2Bpdr5V0Eq%2BJeO31y%2FA4KWE%2FJglDM%3D&reserved=0) (most recently published on April 3, 2024 for the previous May) to estimate an hourly wage for the burden cost. The May 2023 mean wage for bookkeepers was $23.84. The mean wage for farm managers was $43.35. The mean wage for farm supervisors was $29.23. The mean wage of the three is $32.14. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of $42.75 per hour.

Average completion time per questionnaire is based on time required for other surveys of similar length. Calculation of burden hours is shown in the table below. Estimated response counts are based on an 80% target response rate and minutes per response shown are the average times for all questionnaires used for the commodity.











**13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information.**

There are no changes from the original approval for the purposes of program changes.

**14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.**

The total cost to the Federal government to conduct field crop surveys and prepare estimates is estimated to cost approximately $5.5 million per year for the next three years, most of which is staff cost. This includes an estimated $7.0 million reduction due to the discontinuation of the county estimates surveys.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden).**

There is a burden decrease due to the discontinuation of field crop county estimate surveys. The total burden of 111,621 hours is down 30,615 hours from the current inventory of 142,236 hours.

The below table summarizes the changes:



**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

There will be no annual county level estimates published for crops and livestock due to the discontinued County Agricultural Production Survey (CAPS).

If funding continues from the State cooperators, the winter wheat variety surveys may continue, but would be conducted with the December County Agricultural Production Survey (OMB Control Number 0535-0213).

Changes will also be made on state level data that will be published in NASS reports are summarized at this link: <https://www.nass.usda.gov/Newsroom/Notices/2024/04-04-2024.php>

In addition to the changes listed above, NASS will no longer be publishing sugarcane acreage, production, and price statistics for Texas. This is due to the permanent closure of Texas’ only sugarmill as reported by the Texas Farm Bureau (<https://texasfarmbureau.org/texas-only-sugar-mill-to-close-permanently/>).

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

No approval is requested for non-display of the expiration date.

**18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-I.**

There are no exceptions to the certification statement.

 April 2024